

# **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

GEORGE DC PARKER II and LORI A. )  
PARKER, )  
 )  
Plaintiff(s), ) No. 3:23-cv-05069-RJB  
 )  
 )  
vs. )  
 )  
 )  
THE SOCIETY FOR CREATIVE )  
ANACHRONISM, INC., a/k/a/ )  
"SCA" or "SCA, Inc.", et.al, )  
 )  
Defendant(s). )

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VIRTUAL REMOTE DEPOSITION OF

GEORGE DC PARKER, II

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2:00 p.m.

JANUARY 5, 2024

Virtual Zoom Deposition

Washington State

REPORTED BY: ANITA MITCHELL, CSR No. 2586

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1 A. Yep. I like doing it that way. That's perfect.

2 Q. Beautiful. Now, the, the persona that you've  
3 developed for the medieval recreations, so I'm not going  
4 to limit it to just SCA, but you have a persona that  
5 you've developed for use in all of the Societies that,  
6 that you work with; is that correct?

7 A. Absolutely.

8 Q. And tell me about that, that persona. I know I'm  
9 opening a can of worms.

10 A. What exactly do you want to know.

11 Q. Well, one, I want you to properly for me  
12 pronounce the name, because I will butcher that up like  
13 it's nobody's business, and then I want you to tell me  
14 about how you created it, so I can understand a little  
15 bit about you and who you are, if that makes sense.

16 A. I have to chuckle a little bit when you said,  
17 "Hakon" because -- and you spelled what you had for my  
18 name, because actually H-A-K-O-N, in Norse Society in  
19 the 700s, that would have been pronounced Ha'kon.  
20 However, the correct spelling of my name is  
21 H-A-apostrophe-K-O-N, which transforms Hakon (Hai-ken  
22 phonetic) into Ha'kon (Haw-ken phonetic).  
23 Ha'kon Thorgeirsson, and 'geirsson' is third son, so I  
24 am the third son of Thor.

25 Um, it started out when I was working with

1 A. I don't recall for sure.

2 Q. Do you recall if it was at the Society-level or  
3 Kingdom-level?

4 A. That's what I mean. I definitely don't recall.  
5 I'm sure I sent it to a seneschal, whether it was  
6 Kingdom or Society, I don't recall. There were so many  
7 e-mails going back-and-forth at that time, that I don't  
8 recall.

9 Q. Now, on the Facebook posting for LaToya's  
10 Facebook posting, was that on LaToya's -- I know it's  
11 LaToya's personal page, but was it on her page, where  
12 she used the persona name she use in SCA events?

13 A. I don't recall for sure. I would have to look.

14 Q. Was the name she used in the Society, 'Maude  
15 Louisiana d'Orleans'?

16 A. Yes.

17 Q. So if it was -- so if it was a comment on  
18 LaToya's Facebook page, that she used the name 'Maude  
19 Louisiana d'Orleans,' that would have been on a Facebook  
20 posting, with her using her persona she uses in the SCA?

21 A. Yes. And if you said that's the page it was on,  
22 I wouldn't argue with you.

23 Q. Well, maybe I should just do this.

24 A. I think it was.

25 Q. Does this --

1 comment that you did at the time, was it due to  
2 channelling the Ha'kon Thorgiersson, that persona, at  
3 the time?

4 A. No. No, that was all George, absolutely. That  
5 was my sense of right and wrong.

6 Q. Is that --

7 A. It's not okay for me to say something offensive.  
8 It's not okay for you to do it either. And yet that's  
9 exactly what they were doing. I said that's offensive.  
10 You say this is offensive, whatever 'this' is. If  
11 you're right, so am I. If I'm wrong, so are you. They  
12 didn't see it that way, and to this day, they still  
13 don't see it that way, as evidenced by the fact that no  
14 one else was sanctioned on that entire list, no matter  
15 what they did. Rules for me and none for you.

16 Q. At the R&D process -- let me take a step back.  
17 In the e-mail chain, with Stacy Hall, in regard to the  
18 Board's review of the exile, Ms. Hall gave you the  
19 opportunity to have a verbal or video discussion to  
20 explain your side of the story, right?

21 A. Yes.

22 Q. And you opted to not do that, but instead to  
23 provide a written response and to answer any questions  
24 that she may put to you in writing, so you can put a  
25 written response back to her, right?

1 A. Yes.

2 Q. And that was your decision to make, about how to  
3 approach and how to be heard in the appeal -- or in the  
4 review process?

5 A. Yes.

6 Q. And then the exile was ultimately upheld and then  
7 there was the R&D process that came about after that,  
8 right?

9 A. Yes.

10 Q. And were you contacted or did you have an  
11 opportunity to present additional information to the R&D  
12 process, if you so chose?

13 A. Again, this goes to my issue with timelines.  
14 Evidently there was a time when I responded to the  
15 exile, and I didn't remember that one, but there was a  
16 huge, long e-mail I sent in reference to Lis' query,  
17 with very verbose responses, if I have the timeline.

18 Q. Okay. As we sit here, you don't have a  
19 recollection, one way or the other, whether or not you  
20 had the opportunity to provide additional information at  
21 the R&D stage, beyond what you provided to the exile  
22 review. Would that be fair?

23 A. I want to say I did have an opportunity to  
24 present all the evidence I wanted to. I'm not  
25 contending -- what do you call it -- that's not a

1 I could, estimate that continuing trend.

2 Now, we had a steady upward mobility in the  
3 revenue generated.

4 Q. Now, I understand that those numbers were revenue  
5 generated. Those numbers did not include the, the  
6 expenses that would deduct from revenue, to equal  
7 profit, right?

8 A. Correct.

9 Q. And you don't have any documents that actually  
10 identify how much profit The Norse Gypsy Forge obtained  
11 or received in any given year, do you?

12 A. I don't think so. We treated it more as a hobby  
13 than a business.

14 Q. So how can you identify any lost profits in, in  
15 regard to The Norse Gypsy Forge?

16 A. Profits is your term, not mine. I said "revenue,  
17 revenue generated." I don't mean to be argumentative.  
18 If that was argumentative, I apologize.

19 Q. Okay. You understand what profits are, right?

20 A. Absolutely.

21 Q. And in fact, that's something that for your, your  
22 business, Drakkar, you do track your profit in regard to  
23 that company, correct?

24 A. Absolutely.

25 Q. And your, your income is actually largely based

## REPORTER'S CERTIFICATE

I, ANITA MITCHELL, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me via videoconference; that any and/or all witness(es) were duly sworn to tell the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring via videoconference; that a review of which was requested; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE THIS  
18TH DAY OF JANUARY, 2024.



ANITA MITCHELL, CSR No. 2586